

1 REMARKS

2 Reconsideration and allowance of the present application are respectfully
3 requested. Claims 1-12, 15, and 17-36, and 38-49 are currently pending in this
4 application.

5

6 *Regarding Objections to the Abstract*

7 The Office Action objects to the abstract because it includes too many words. A
8 new abstract is submitted herewith that includes no more than 150 words. Accordingly,
9 the Applicant respectfully requests the Patent Office to remove the objection to the
10 abstract.

11

12 *Regarding the Office Action's Comments on the Specification*

13 Paragraph No. 8 of the Office Action requests the Applicant to update the status
14 of all patent applications mentioned in the specification. The two patent applications
15 mentioned in the specification (Serial No. 10/395,506 and Serial No. 10/404,312
16 mentioned on pages 26 and 28, respectively) remain pending. That is, these applications
17 have not yet issued as patents. The Applicant will update the specification to provide the
18 patent numbers assigned to these applications in due course.

19 Paragraph No. 9 of the Office Action requests the Applicant to correct any minor
20 errors in the specification that Applicant may independently identify upon review of the
21 application. Applicant will make appropriate changes to the specification when any such
22 errors are noted.

1 *Regarding the Rejection of Claims 13 and 14 under 35 U.S.C. § 112, Second*
2 *Paragraph, and 35 U.S.C. § 101.*

3 Claims 13 and 14 are rejected under both 35 U.S.C. § 112, Second Paragraph, and
4 35 U.S.C. § 101. The Office Action asserts that these claims impermissibly combine
5 different claim types. While the Applicant disagrees with this conclusion, to expedite
6 prosecution of this case, this Response cancels claims 13 and 14 without prejudice or
7 disclaimer. For this reason, the Applicant respectfully requests the Patent Office to
8 withdraw the rejections under 35 U.S.C. § 112, Second Paragraph, and 35 U.S.C. § 101.
9

10 *Regarding the 35 U.S.C. § 102(b) Rejection*

11 Claims 1-37 are rejected under 35 U.S.C. § 102(b) as being anticipated by Altova,
12 Inc., “XML Spy 4.0 Manual,” (referred to below as “Altova” for brevity). Applicant
13 respectfully traverses this rejection for the following reasons. Since claims 13, 14, 16,
14 and 37 have been canceled without prejudice or disclaimer herein, the 35 U.S.C. § 102(b)
15 rejection will be addressed in the context of the pending rejected claims, namely, claims
16 1-12, 15, and 17-36.

17 Altova describes version 4.0 of the XML Spy product. Altova states that the
18 purpose of the XML Spy product is to simplify typical XML editing tasks (see page 2).
19 Altova describes the presentation of XML information in multiple different views: an
20 Enhanced Grid view; Schema view; Text view; and Browser view (see page 19). Altova
21 provides examples of editing performed in the Text view and Enhanced Grid view (see
22 pages 56-59). In another section, Altova describes an XSL transformation, which
23 involves assigning a predefined Company.xsl file to an XML document, and using this
24 XSL file to transform the XML document into an HTML document (see pages 73-76). In
25

1 another section, Altova describes an XML Spy Document Editor that enables a user to
2 edit XML documents based on templates created in a product referred to as XSLT
3 Designer (see pages 343-362). Altova shows presentations generated by the XML Spy
4 Document Editor which includes visible markup symbols (e.g., see the top figure of page
5 355).

6 Altova does not anticipate any of the claims. To begin with, consider claim 1,
7 which is reproduced below in its entirety:

8

9 1. A method for mapping between parts of an input document and associated parts
10 of an output document, the input document pertaining to a first kind of document, and the
11 output document pertaining to a second kind of document, comprising:
12

13 providing a translation file that converts documents of the first kind to documents of
14 the second kind;

15 in a first phase, modifying the translation file to include mapping functionality that
16 can provide information regarding relationships between parts of documents of the first kind
17 and associated parts of documents of the second kind, the first phase producing a modified
18 translation file;

19 in a second phase, using the modified translation file to convert the input document
20 into the output document, including:

21 activating the mapping functionality; and

22 using the mapping functionality to provide references in the output
23 document that associate parts of the output document with parts of the input
24 document.

25

1 Altova does not describe the invention recited in claim 1. As noted above, Altova
2 shows multiple ways of viewing XML information, including a Text View and an
3 Enhanced Grid view. Further, Altova shows the display of XML markup symbols in a
4 document. However, Altova does not disclose the technical manner in which it achieves
5 these results, and therefore does not disclose the specific subject matter of claim 1. For
6 instance, Altova does not describe at least the following parts of claim 1, when read in the
7 context of the claim as a whole:

8

9 in a first phase, modifying the translation file to include mapping functionality that
10 can provide information regarding relationships between parts of documents of the first kind
11 and associated parts of documents of the second kind, the first phase producing a modified
12 translation file;

13 in a second phase, using the modified translation file to convert the input document
14 into the output document, including:

15 activating the mapping functionality; and

16 using the mapping functionality to provide references in the output
17 document that associate parts of the output document with parts of the input
18 document.

19

20 The Office Action addresses the claim language as follows:

21

22 See XML Spy, pages 1-17, teaching an XML file, XML Schema, XML transform
23 and editing in a database view. See also, XML Spy, pages 73-90, teaching the translation of
24 an XML file to HTML using and [sic] XSL transformation as the translation file. See also,

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1 XML Spy, pages 343-362, teaching editing an XML, XSL, HTML or other file format
2 including a mapping functionality that provides references in the output document that
3 associates parts of the output document with parts of the input document. (Note page 7 of
4 the Office Action.)

5
6 This analysis does not address what is specifically being recited in claim 1. For
7 instance, while Altova describes an XSL transformation in pages 73-76, this does not
8 meet the subject matter recited in claim 1. For example, while XSLT is conventionally
9 used to translate from XML to HTML and therefore can be construed as *one* exemplary
10 variety of a translation file, **Altova does not describe that its various features are**
11 **produced by modifying a translation file to include mapping functionality (in a first**
12 **phase) and then activating the mapping functionality (in a second phase) in the**
13 **manner recited in claim 1.** Nor is this subject matter inherent to the information which
14 Altova does disclose.

15 For at least the above-identified reasons, Altova does not disclose the subject
16 matter of independent claim 1. Independent claims 17 and 29 recite related subject to
17 claim 1, and therefore distinguish over Altova for reasons that are similar to those
18 provided above with respect to claim 1.

19 Next consider independent claim 15, which is reproduced below in its entirety:

20
21 15. A method for generating mapping functionality that can map between parts of
22 an input document and associated parts of an output document, the input document
23 pertaining to a first kind of document, and the output document pertaining to a second kind
24 of document, comprising:
25

1 providing a translation file that converts documents of the first kind to documents of
2 the second kind; and

3 modifying the translation file to include mapping functionality that can provide
4 information regarding relationships between parts of documents of the first kind and
5 associated parts of documents of the second kind.

6
7 Altova does not disclose the providing and modifying operations recited in claim

8 15. For instance, while XSLT is conventionally used to translate from XML to HTML
9 and therefore can be construed as *one* exemplary variety of a translation file, Altova does
10 not describe that its various features are produced by modifying a translation file to
11 include mapping functionality in the manner recited in claim 15. Nor is this subject
12 matter inherent to the information which Altova does disclose.

13 For at least the above-identified reasons, Altova does not disclose the subject
14 matter of independent claim 15. Independent claim 30 recites related subject to claim 15,
15 and therefore distinguishes over Altova for reasons that are similar to those provided
16 above with respect to claim 15.

17 Next consider independent claim 31, which is reproduced below in its entirety:

18
19 31. A computer readable medium having stored thereon an information structure,
20 comprising:

21 a plurality of translation elements configured to convert a first kind of document
22 into a second kind of document; and

23 a plurality of functions interspersed amongst the plurality of translation elements,
24 the plurality functions configured to provide a respective plurality of references, wherein the

1 references provide pointers that link parts of the second kind of document with parts of the
2 first kind of document.

3

4 Altova does not disclose a plurality of translation elements in conjunction with a
5 plurality of functions which are interspersed amongst the plurality of translation elements
6 in the manner recited in claim 31. For instance, while XSLT is conventionally used to
7 translate from XML to HTML documents and therefore can be construed as *one*
8 exemplary variety of a file containing translation elements, Altova does not describe that
9 its various features are produced by interspersing a plurality of functions amongst the
10 translation elements. Nor is this subject matter inherent to the information which Altova
11 does disclose.

12 For at least the above-identified reasons, Altova does not disclose the subject
13 matter of independent claim 31. Independent claim 34 recites related subject to claim 31,
14 and therefore distinguishes over Altova for reasons that are similar to those provided
15 above with respect to claim 31.

16 The dependent claims are likewise not disclosed by Altova by virtue of at least
17 their dependency on the above-identified independent claims. The dependent claims also
18 recite additional elements which distinguish over the Altova reference. To cite merely
19 one example, claims 9, 10, 25, and 26 recite the use of extension functions expressed in
20 the extensible stylesheet language (XSL). Altova describes the use of XSL, but does not
21 mention the specific use of extension functions. The Office Action identifies page 73 of
22 Altova as having relevance to the claimed subject matter (see pages 9 and 10 of the
23 Office Action). This page describes the use of XSL, but does not disclose any use of

1 extension functions. Nor does the mere use of XSL inherently imply the use of extension
2 functions.

3 As stated in MPEP § 2131, “A claim is anticipated only if each and every element
4 as set forth in the claim is found, either expressly or inherently described, in a single prior
5 art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053
6 (Fed. Cir. 1987). As noted above, Altova fails to disclose all of the elements in the
7 independent claims. Accordingly, Altova fails to anticipate any of the claims under 35
8 U.S.C. § 102.

9 Furthermore, because Altova does not describe the manner in which it produces
10 its results, this document is deficient under law because it is a non-enabling reference.
11 Note MPEP § 2121.

12 For at least the above-identified reasons, the Applicant respectfully requests the
13 Patent Office to remove the 35 U.S.C. § 102 rejection based on Altova.

14

15 *Regarding Newly Presented Claims*

16 This Response presents new claims 38-49. These claims depend variously from
17 the above-identified independent claims, and distinguish over Altova for at least this
18 reason. Further, these claims recite additional subject matter which is not disclosed or
19 suggested by Altova.

20

21 *Conclusion*

22 The arguments presented above are not exhaustive; Applicant reserves the right to
23 present additional arguments to fortify its position. Further, Applicant reserves the right
24 to challenge the prior art status of one or more documents cited in the Office Action.

25

1 In conclusion, all objections and rejections raised in the Office Action having
2 been addressed, it is respectfully submitted that the present application is in condition for
3 allowance and such allowance is respectfully solicited. The Examiner is urged to contact
4 the undersigned if any issues remain unresolved by this Amendment.

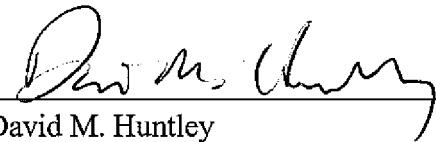
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7 Respectfully Submitted,

8 Dated: June 20, 2006

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